



Privacy Policy

At Thompson, Davis & Co., Inc. (TD & Co.), and Thompson Davis Asset Management, a division of TD & Co., we recognize the importance of maintaining the utmost security and confidentiality of our customers' information. In addition to internal policies and procedures designed to safeguard customer information, we prohibit those with whom we do business from any reuse of that information for purposes other than those intended by TD & Co.

This privacy policy applies to all consumers. Our privacy policy is subject to change. In the event that changes occur, you will be informed in accordance with applicable laws. Additionally, you will be provided with our privacy policy annually. For purposes of this policy, customer information means personally identifiable information about a consumer who has a relationship with TD & Co.

Accordingly, at TD & Co. we have adopted the following:

Customer information security and confidentiality

We take a number of steps to ensure that customer information is adequately safeguarded. These steps include the following: (1) implementing a number of physical and electronic security features to prevent unauthorized access; (2) limiting employee access to customer information; and (3) conducting periodic reviews of our computer systems, including security features. Additionally, our employees are required to acknowledge their responsibility to maintain the confidentiality of customer information.

How we collect customer information

Thompson Davis & Co. collects information that helps to serve client financial needs, provide high standards of client service, develop and offer new services or products for clients and potential clients, and fulfill legal and regulatory requirements. The information collected generally varies depending on the services or products you request and may include:

- Information provided in personal interviews or on applications and related forms—for example, name, age, address, Social Security number, annual income, financial status, family history, and when applicable, medical history.
- Responses from your team of advisors (such as your attorney, accountant, banker), employer, benefit plan sponsor, or other third party that you authorize us to contact or that provides us with information directly—for example, legal documents, tax records, account information.
- Information about your relationships with us, such as products or services purchased, and account balances (if applicable), which we may obtain in writing, during telephone or Internet transactions or from data-gathering software.

How we disclose customer information

We may disclose customer information under the following circumstances: (1) to verify or complete a transaction; (2) to verify the existence and condition of your account for a third party, such as another financial institution; (3) to a third party that performs functions on behalf of TD & Co. (i.e., a custodian or clearing broker-dealer); (4) to comply with laws, regulations, or a court or government order or request; (5) to inform you of our other products or services; or (6) if you or any authorized person on the account gives us oral or written permission to do so.

Customer information we disclose to others

We may disclose customer information to others as follows: (1) parties who we request to verify the accuracy of information that a customer has provided to us; and (2) parties who assist us in servicing our customer's accounts, such as a custodian or clearing broker-dealer. Additionally, we provide customer information to others as permitted by law, which include: (1) in response to a subpoena, levy, garnishment or other legal process; and (2) in response to a request by an auditor or SEC/FINRA examiner.

Customer right to opt out

Except as described in this privacy notice, TD & Co. will not use personal information for any other purpose unless we describe in advance how such personal information will be used and you are given an opportunity to decline approval by calling us at 804-644-6380 or emailing us at pwalz@thompsondavis.com.

Customer information about former customers

We apply the same privacy policies and practice to our former customers that we do to our existing customers. Collected customer information is retained in accordance with federal law.

Customer information—accuracy

We recognize the importance of maintaining accurate customer information that is provided to you in various forms, including account statements and billing statements. If you ever notice that your information is inaccurate, please contact us. Upon your notification, we will correct any inaccuracies.

Privacy Policy Availability

A copy of TD & Co.'s privacy policy may be obtained without charge by visiting or contacting our office. It is also available on our website, www.thompsondavis.com.

SIPC

Clients may obtain information about the Securities Investor Protection Corporation (SIPC) by dialing 202-371-8300, and you may view the SIPC brochure at the website, www.sipc.org.